

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Allen Beaulieu, individually and D/B/A
Allen Beaulieu Photography,

CASE NO. 16-cv-3586 (DWF/HB)

Plaintiff,

v.

**PLAINTIFF’S REPLY TO
DEFENDANTS’ COUNTERCLAIMS**

Clint Stockwell, an individual; Studio
1124, LLC, a Minnesota limited liability
company and Does 1 through 7,

Defendants.

Plaintiff Allen Beaulieu (“Plaintiff”) as and for his reply to the Counterclaims of Defendant Clint Stockwell (“Defendant Stockwell”) states and alleges as follows:

Plaintiff denies each and every allegation, matter and thing alleged in Defendant Stockwell’s Counterclaims unless hereinafter specifically admitted or otherwise qualified.

1. Answering paragraph 1 of the Counterclaims, Plaintiff admits only the allegation that Defendant Stockwell is a resident of this judicial district.

2. Plaintiff admits the allegations contained in paragraph 2 of the Counterclaims.

3. Plaintiff admits the allegations contained in paragraph 3 of the Counterclaims.

4. Plaintiff admits the allegations contained in paragraph 4 of the Counterclaims.

5. Plaintiff denies the allegations contained in paragraph 5 of the Counterclaims.

6. Plaintiff denies the allegations contained in paragraph 6 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

7. Plaintiff denies the allegations contained in paragraph 7 of the Counterclaims.

8. Answering paragraph 8 of the Counterclaims, Plaintiff admits only that he contacted Defendant Stockwell in late 2015 regarding the book project involving Plaintiff's photographs of Prince.

9. Answering paragraph 9 of the Counterclaims, Plaintiff admits only that he contacted Thomas Crouse, as he knew of Mr. Crouse as a copyrighter.

10. Answering paragraph 10 of the Counterclaims, Plaintiff admits only that he met with Mr. Crouse and Defendant Stockwell on a few occasions in early 2016 about the proposed book project. Plaintiff puts Defendant Stockwell to his strict burden of proof related to the balance of the allegations in paragraph 10.

11. Answering paragraph 11 of the Counterclaims, Plaintiff admits only that he received additional requests to license his photographs of Prince, after Prince's death in April 2016. Plaintiff puts Defendant Stockwell to his strict burden of proof related to the balance of the allegations in paragraph 11.

12. Plaintiff denies the allegations in paragraph 12 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

13. Answering paragraph 13 of the Counterclaims, Plaintiff admits only that Mr. Crouse and Defendant Stockwell came to Plaintiff's residence, and that Defendant Stockwell left with Plaintiff's photographs of, and related to, Prince. Plaintiff puts Defendant Stockwell to his strict burden of proof related to the balance of the allegations in paragraph 13.

14. Plaintiff denies the allegations in paragraph 14 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

15. Plaintiff denies the allegations in paragraph 15 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

16. Plaintiff denies the allegations in paragraph 16 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

17. Answering paragraph 17 of the Counterclaims, Plaintiff admits only that Defendant Stockwell sent an email to Plaintiff with an attached document that purported to be an invoice on or about August 31, 2016. Plaintiff puts Defendant Stockwell to his strict burden of proof related to the balance of the allegations in paragraph 17.

18.

18. Plaintiff denies the allegations in paragraph 18 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

19. Plaintiff denies the allegations in paragraph 19 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

20. Plaintiff incorporates by reference and realleges his responses in the above paragraphs.

21. Plaintiff denies the allegations in paragraph 21 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

22. Plaintiff denies the allegations in paragraph 22 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

23. Plaintiff denies the allegations in paragraph 23 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

24. Plaintiff denies the allegations in paragraph 24 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

25. Plaintiff denies the allegations in paragraph 25 of the Counterclaims, and puts Defendant Stockwell to his strict burden of proof.

WHEREFORE, Plaintiff seeks an Order of the Court as follows:

1. Dismissing Defendants' pretended Counterclaims, with prejudice;
2. Awarding Plaintiff his attorneys' fees, costs and disbursements; and
3. For such other and further relief as the Court deems just and equitable.

Dated: December 5, 2016

HELLMUTH & JOHNSON, PLLC

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